

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JOON BANG, RAZVAN VICTOR
BENGULESCU, GERALD BEZEMS,
SCOTT CROCKETT, FIFAT GORENER,
CHRISTOPHER LESIEUR, LAWRENCE
MARCUS, and MIKHAIL
SULEYMANOV, individually and on
behalf of others similarly situated,

Plaintiffs,

vs.

BMW OF NORTH AMERICA, LLC,
BAVARIAN MOTOR WORKS, and
DOES 1 through 10, inclusive,

Defendants.

No. 2:15-cv-6945 (MCA)(LDW)

CLASS ACTION

JURY TRIAL DEMANDED

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION FOR ATTORNEYS' FEES,
EXPENSES, AND INCENTIVE AWARDS**

PLEASE TAKE NOTICE that at the Final Fairness Hearing scheduled for September 10, 2018 at 2:30 p.m., Plaintiffs will move to have the Court enter the proposed order submitted herewith that will grant their unopposed motion seeking (1) the payment of \$3,022,000 to Plaintiffs' counsel for the payment of their attorneys' fees and reimbursement of expenses, and (2) the payment of incentive awards in the amount of \$3,500 each for Plaintiffs Joon Bang, Razvan Victor

Bengulescu, Gerald Bezems, Scott Crocket, Fifat Gorener, Christopher LeSieur, Lawrence Marcus, and Mikhail Suleymanov (\$28,000 in total).¹

PLEASE TAKE FURTHER NOTE that Plaintiffs will rely on the Memorandum of Law, Declarations of Counsel and other related materials in support of this motion.

PLEASE TAKE FURTHER NOTE that Defendants do not oppose this motion.

Dated: August 9, 2018

Respectfully submitted,

SAUDER SCHELKOPF LLC

By: //s// *Matthew D. Schelkopf*
Joseph G. Sauder
Matthew D. Schelkopf
Joseph B. Kenney
555 Lancaster Avenue
Berwyn, PA 19312
Telephone: (610) 200-0581
jgs@sstriallawyers.com
mds@sstriallawyers.com
jbk@sstriallawyers.com

David C. Wright
MCCUNE WRIGHT AREVALO, LLP
3281 East Guasti Road, Suite 100
Ontario, CA 91761
Telephone: (909) 557-1250
dcw@mccunewright.com

¹ Plaintiffs will also request that the Court enter an order granting final approval to the settlement and dismissing this action with prejudice. A motion seeking that relief will be filed separately.

Eric D. Barton
Melody Dickson
WAGSTAFF & CARTMELL LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
Telephone: (816) 701-1100
ebarton@wcllp.com
mdickson@wcllp.com

*Attorneys for Plaintiffs and the
Proposed Settlement Class*

CERTIFICATE OF SERVICE

I, Matthew D. Schelkopf, hereby certify that the foregoing **Notice of Plaintiffs' Unopposed Motion for Attorneys' Fees, Expenses, and Incentive Awards** was filed on this 9th day of August, 2018, using the Court's CM/ECF system, thereby electronically serving it on all counsel of record in this case.

/s/ Matthew D. Schelkopf
Matthew D. Schelkopf